



STATE OF MISSISSIPPI
PHIL BRYANT, GOVERNOR
DEPARTMENT OF HUMAN SERVICES
RICHARD A. BERRY
EXECUTIVE DIRECTOR

February 10, 2014

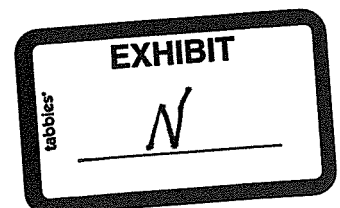
To: Olivia Y Court Monitor Grace Lopes and Julia Davis of Children's Rights Inc.

Re: Maltreatment in Care Investigation Timeliness

As required by the Final Period 4 Implementation Plan (Section III.A.1.), this letter is submitted in order to address barriers to timely initiation and completion of maltreatment in care investigations. For the purpose of this letter, 'maltreatment in care' means any investigation in which a foster child is an alleged victim.

Please see the attached Maltreatment in Care Timeliness Action Plan that identifies barriers to timely initiation and includes specific strategies, action steps and timelines to immediately address deficiencies in the timely initiation and completion of maltreatment in care investigations. Once approved by the Monitor, this plan will be implemented within the timeframes contained therein.

DHS
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Timely Initiation and Completion of Maltreatment in Care Investigations (MSA Section II.B.1.e.2)
(For the purpose of this letter required by the Year 4 IP, 'maltreatment in care' means any investigation in which a foster child is an alleged victim).

GOAL: 100% of Maltreatment in Care Reports will be initiated and completed timely; 24 hours and 30 days respectively.

ACTION PLAN: Identify actions to be taken to immediately address the failure to timely initiate and complete investigations of maltreatment in care:

BARRIERS IDENTIFIED	ACTIONS TO BE TAKEN	DATE BY WHICH ACTION WILL BE IMPLEMENTED	PERSON(S) RESPONSIBLE
<ol style="list-style-type: none"> 1. Regional Directors have reported that they are not consistently receiving timely notification that a report of MIC has been taken and entered in MACWIS for their Region. 	<ol style="list-style-type: none"> 1. During work hours and after hours Social resource reports and reports of children in custody to the following persons; RASWS, RD, OD I for Field Operations, BD of Permanency, Program Manager for Prevention/Protection Unit, Staff Attorney, BD of Special Investigations, and BD for Prevention/Protection. In addition, BD for Prevention/Protection, Program Manager for Investigations Unit (Staff Attorney or BD) will meet monthly with P.R.N. staff to ensure compliance and address any ongoing issues with consistent timely notifications. 	<p>March 15, 2014</p>	<p>Program Manager with Prevention/Protection Unit will provide MCI with a list of required notifications and MCI will be responsible for making the correct email notifications. BD for Prevention/Protection, Program Manager for Prevention/Protection, Staff Attorney, and BD for Special Investigations.</p>
<ol style="list-style-type: none"> 2. The inappropriate use of the Resource Report designation (i.e. an ANE report entered when a house parent called to notify the agency that a child was in need of a medical procedure with no allegation of maltreatment and no indication that a child is being maltreated by a caregiver) is causing resource investigators to spend unnecessary time following up on reports while at the same time artificially inflating numbers of ANE reports designated as Resource Reports. 	<ol style="list-style-type: none"> 2. Guidance will be provided to MCI to better define what an ANE report is and what should be entered as an Information and Referral. 	<p>March 15, 2014</p>	<p>BD for Prevention/Protection and Program Manager with Prevention/Protection.</p>

3. Assigned investigator is not making face to face contact with the alleged victim within the first 24 hours of the report being received.	3. a. If assigned investigator fails to initiate timely, appropriate disciplinary action will be taken to address the insubordination and failure to follow established policy. OD for Filed Operations will ensure that RD's are taking appropriate disciplinary action when needed. b. If RD fails to assign timely, appropriate disciplinary action will be taken to address the insubordination and failure to follow established policy. Deputy Administrator for DFCS will ensure that OD for Filed Operations is taking appropriate action when needed.	March 15, 2014	Regional Directors, OD for Field Operations and Deputy Administrator.
4. Data Entry error recording correct initiation date and time, and data entry error failing to enter the alleged perpetrator and/or victim into the "participants box" which causes the data to not be captured for reporting.	4. Regional Directors responsible for approving MIC investigations will be reminded to carefully review submitted investigations for timeliness and accuracy and to contact investigators if there are questions or corrections that need to be made.	March 15, 2014	OD for Field Operations and BD for Special Investigations
5. COR/COS or other worker receives initial disclosure of ANE from the child and then makes a report to centralized intake. The report is later assigned to the MIC trained investigator to complete the investigation but the first worker fails to enter narratives from the initial disclosure.	5. a. Regional Director must ensure that communication occurs between workers and ensure that MIC report is assigned timely to a worker who has been trained to do MIC investigations and that all narratives from initial disclosure are entered. b. Policy will be reviewed with Regional Directors regarding MIC investigations to ensure that policy is being adhered to.	March 15, 2014	Regional Directors OD for Field Operations, Deputy Administrator, BD for Special Investigations
6. Investigative workers in some regions are assigned too many MIC investigations and are having difficulty keeping up due to volume of investigations.	6. Regional Directors will assign each dedicated investigator no more than five special investigations to be open at any one time and a worker with a mixed caseload will be assigned no more than three special investigations to be open at any one time. All workers assigned investigations of maltreatment in care are required to have successfully completed Maltreatment Training. If any region has a shortage of trained investigators, additional training will be provided.	April 1, 2014	Regional Directors

<p>7. MIC reports are submitted by the investigators for approval and are not approved or pending back timely by Regional Directors.</p>	<p>7. Bureau Director for SIU, Staff Attorney, or designee will maintain a tracking system, utilizing MACWIS data reports to ensure that progress is being documented on active MIC investigations and notify the appropriate parties: e.g. RD and Director of Field Operations if there is a lack of progress on MIC investigations that could delay the timely completion, submission, and approval of the MIC investigations. If Regional Directors fail to take timely action on submitted investigations, appropriate disciplinary action will be initiated</p>	<p>April 1, 2014</p>	<p>Bureau Director for SIU, Staff Attorney, Deputy Administrator, and OD for Field Operations</p>
<p>8. Regions III N, III S, VI, and Harrison County consistently have deficits in initiating and completing MIC investigations timely and require additional support.</p>	<p>8. Two FPS Advanced will be put on 90 day Special Assignment to complete MIC investigations. One will cover Regions III N and III S, and one will cover Region VI and Harrison County. These two FPSA will be put on MACWIS workload of Bureau Director for SIU and report directly to Bureau Director for SIU or designee for 90 days.</p>	<p>April 1, 2014</p>	<p>Deputy Administrator, Staff Attorney, and Bureau Director for SIU, along with input from RDs will identify and recruit two FPSA for special assignment.</p>

Timely Initiation and Completion of Maltreatment in Care Investigations (MSA Section II.B.1.e.2) (For the purpose of this letter required by the Year 4 IP, 'maltreatment in care' means any investigation in which a foster child is an alleged victim).

GOAL: 100% of Maltreatment in Care Reports will be initiated and completed timely; 24 hours and 30 days respectively.

ACTION PLAN: Identify actions to be taken to immediately address the failure to timely initiate and complete investigations of maltreatment in care:

BARRIERS IDENTIFIED	ACTIONS TO BE TAKEN	DATE BY WHICH ACTION WILL BE IMPLEMENTED	PERSON(S) RESPONSIBLE
<p>1. Regional Directors and Bureau Director for Special Investigations have reported that they are not consistently receiving timely notification that a report of MIC has been taken and entered in MACWIS for their Region.</p>	<p>1. a. During work hours and after hours Social Work prn will send email notifications of all resource reports and reports of children in custody to the following persons; RASWS, RD, OD I for Field Operations, BD of Permanency, Program Manager for Prevention/Protection Unit, Staff Attorney, BD of Special Investigations, and BD for Prevention/Protection. In addition, BD for Prevention/Protection, Program Manager for Prevention/Protection, and a member of the Special Investigations Unit (Staff Attorney or BD) will meet monthly with Social Work prn staff to ensure compliance and address any ongoing issues with consistent timely notifications.</p> <p>b. DFCS will monitor to ensure timely notifications are transmitted by MCI. Bureau Director for Prevention/Protection will be responsible for Monitoring, tracking, and notifying MCI of errors in notifications.</p>	<p>March 15, 2014</p>	<p>Program Manager with Prevention/Protection Unit will provide MCI with a list of required notifications and MCI will be responsible for making the correct email notifications. BD for Prevention/Protection, Program Manager for Prevention/Protection, Staff Attorney, and BD for Special Investigations.</p>
<p>2. The inappropriate use of the Resource Report designation (i.e. an ANE report entered when a house parent called to notify the agency that a child was in need of a medical procedure with no allegation of maltreatment and no indication that a child is being maltreated by a caregiver) is causing resource investigators to spend</p>	<p>2. a. Guidance will be provided to MCI to better define what an ANE report is and what should be entered as an Information and Referral.</p> <p>b. A meeting will be held with appropriate representatives from DFCS (including representatives from the Prevention/Protection Unit, Special</p>	<p>March 15, 2014 May 1, 2014</p>	<p>Bureau Director for Prevention/Protection or designee.</p> <p>BD for Prevention/Protection and Program Manager with Prevention/Protection.</p> <p>DFCS and MIS staff</p>

<p>unnecessary time following up on reports while at the same time artificially inflating numbers of ANE reports designated as Resource Reports.</p>	<p>Investigations Unit, and MACWIS Unit) and MIS to discuss the necessity and feasibility of modifications to intake/investigation in MACWIS including but not limited to:</p> <ul style="list-style-type: none"> • Ability to over-ride/screen-out by the RD and the Bureau Director for Special Investigations if a report related to a child in custody is screened in by MCI, but does not concern maltreatment in care. • Consolidation of duplicate reports. <p>c. Following the meeting described in "b," a Functional Requirements Document for submission to MIS will be drafted by MACWIS staff and circulated for comments. The final FRD will be submitted to MIS by June 15, 2014.</p>	<p>June 15, 2014</p>	<p>MACWIS staff</p>
<p>3. Insubordination</p>	<p>3. a. if assigned investigator fails to initiate timely, appropriate disciplinary action will be taken to address the insubordination and failure to follow established policy. OD for Filed Operations will ensure that RD's are taking appropriate disciplinary action when needed.</p> <p>b. if RD fails to assign timely, appropriate disciplinary action will be taken to address the insubordination and failure to follow established policy. Deputy Administrator for DFCS will ensure that OD for Filed Operations is taking appropriate action when needed.</p>	<p>March 15, 2014</p>	<p>Regional Directors, OD for Field Operations and Deputy Administrator.</p>
<p>4. Data Entry error recording correct initiation date and time, and data entry error failing to enter the alleged perpetrator and/or victim into the "participants box" which causes the data to not be captured for reporting.</p>	<p>4. Regional Directors responsible for approving MIC investigations will be reminded to carefully review submitted investigations for timeliness and accuracy and to contact investigators if there are questions or corrections that need to be made.</p>	<p>March 15, 2014</p>	<p>OD for Field Operations and BD for Special Investigations</p>

<p>5. COR/COS or other worker makes ANE report to MCI and receives initial disclosure of ANE from the child, and then the report is later reassigned to the MIC trained investigator who will complete it, and the first worker fails to enter narratives from the initial disclosure, or there is confusion as to whether the report is actually initiated if done by the original worker who receives disclosure and makes report.</p>	<p>5. a. Regional Director must ensure that communication occurs between workers and ensure that MIC report is reassigned timely to a worker who has been trained to do MIC investigations and that all narratives from initial disclosure are entered.</p> <p>b. Policy will be reviewed/clarified with Regional Directors regarding MIC investigations to ensure that policy is being adhered to.</p>	<p>March 15, 2014</p>	<p>Regional Directors</p>
<p>6. Investigative workers in Hinds and Harrison counties are assigned too many investigations into MIC and are having difficulty keeping up due to volume of investigations.</p>	<p>6. Regional Directors will assign no dedicated investigators any more than five special investigations to be open at any one time and a worker with a mixed caseload will be assigned no more than three special investigations to be open at any one time. All workers assigned investigations of maltreatment in care are required to have successfully completed Maltreatment Training. If any region has a shortage of trained investigators, additional training will be provided.</p>	<p>April 1, 2014</p>	<p>Regional Directors</p>
<p>7. MIC reports are submitted by the investigators for approval and are not approved or pending back timely by Regional Directors.</p>	<p>7. Bureau Director for SIU, Staff Attorney, or designee will maintain a tracking system, utilizing MACWIS data reports to ensure that progress is being documented on active MIC investigations and notify the appropriate parties: e.g. RD and Director of Field Operations if there is a lack of progress on MIC investigations that could delay the timely completion, submission, and approval of the MIC investigations. If Regional Directors fail to take timely action on submitted investigations, appropriate disciplinary action will be initiated</p>	<p>March 15, 2014</p>	<p>Bureau Director for SIU, Staff Attorney, Deputy Administrator, and OD for Field Operations</p>
<p>8. Regions III N, III S, VI, and Harrison County consistently have deficits in initiating and completing MIC investigations timely and require</p>	<p>8. Two FPS will be put on 90 day Special Assignment to complete MIC investigations. One will cover Regions III N and III S, and one will cover Region VI</p>	<p>April 1, 2014</p>	<p>Deputy Administrator, Staff Attorney, and Bureau Director for SIU, along with input from RDs will identify and recruit two FPS for special assignment.</p>

additional support.		and Harrison County. These two FPS will be put on MACWIS workload of Bureau Director for SIU and report directly to Bureau Director for SIU or designee for 90 days. If number of MIC investigations exceeds standards indicated in number 6, additional MIC trained investigators will be assigned to cover excess investigations.	
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